

ORIGINAL

FLORENCE T. NAKAKUNI #2286
 United States Attorney
 District of Hawaii

LESLIE E. OSBORNE, JR. #3740
 Chief, Criminal Division

THOMAS J. BRADY #4472
 Assistant U.S. Attorney
 Room 6-100, PJKK Federal Building
 300 Ala Moana Boulevard
 Honolulu, Hawaii 96850
 Telephone: (808) 541-2850
 Facsimile: (808) 541-2958
tom.brady@usdoj.gov

FILED IN THE
 UNITED STATES DISTRICT COURT
 DISTRICT OF HAWAII

AUG 20 2014
 at 13 o'clock and 24 min P.M.
 SUE BEITIA, CLERK

Attorneys for Plaintiff
 UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

CR 14-00751 DKW

UNITED STATES OF AMERICA,)	CR. NO.
)	
Plaintiff,)	INDICTMENT
)	
vs.)	Count 1: 18 U.S.C. § 1951
)	Count 2: 18 U.S.C. § 371
MARCUS KALANI WATSON,	(01)	Counts 3-5: 18 U.S.C. § 2113(a)
aka "Kiki Seui,")	Counts 6-7: 18 U.S.C.
ROGUSSIA EDDIE ALLEN)	§ 924(c)(1)(A)(ii)
DANIELSON,	(02)	
AJ WILLIANDER,	(03)	
)	
Defendants.)	
)	

INDICTMENT

COUNT 1 – Hobbs Act Robbery
18 U.S.C. § 1951

The Grand Jury charges:

On or about April 22, 2014, in the District of Hawaii, MARCUS KALANI WATSON, also known as “Kiki Seui,” did unlawfully obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce, as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in commerce, by robbery as that term is defined in Title 18, United States Code, Section 1951, in that Defendant MARCUS KALANI WATSON, also known as “Kiki Seui,” did unlawfully take and obtain personal property from the person and in the presence of an employee of the Reynolds Recycling Inc., located at 4510 Salt Lake Boulevard, Honolulu, Hawaii, against his will by means of actual and threatened force, violence, and fear of injury, immediate and future, to this person.

All in violation of Title 18, United States Code, Section 1951.

//

//

//

//

//

COUNT 2 - Conspiracy
18 U.S.C. § 371

The Grand Jury further charges that:

A. OBJECT OF THE CONSPIRACY

Beginning on an unknown date and continuing to on or after May 30, 2014, in the District of Hawaii, defendants, MARCUS KALANI WATSON, also known as “Kiki Seui,” ROGUSSIA EDDIE ALLEN DANIELSON, AJ WILLIANDER, and others known and unknown to the Grand Jury, knowingly and willfully conspired and agreed with each other to commit bank robbery, in violation of Title 18, United States Code, Section 2113(a).

B. OVERT ACTS

In furtherance of the conspiracy, defendants MARCUS KALANI WATSON, also known as “Kiki Seui,” ROGUSSIA EDDIE ALLEN DANIELSON, AJ WILLIANDER, and others known and unknown to the Grand Jury, committed various overt acts beginning on or about May 1, 2014 and continuing to on or after May 30, 2014, in the District of Hawaii, including, but not limited to, the following:

1. Defendant MARCUS KALANI WATSON, also known as “Kiki Seui,” entered the Central Pacific Bank in Wahiawa to rob it.

2. Defendant MARCUS KALANI WATSON, also known as "Kiki Seui," threatened the employees at the Central Pacific Bank in Wahiawa with a handgun, a dangerous weapon and device.

3. Defendant MARCUS KALANI WATSON, also known as "Kiki Seui," and ROGUSSIA EDDIE ALLEN DANIELSON entered the American Savings Bank in Salt Lake to rob it.

4. Defendant MARCUS KALANI WATSON, also known as "Kiki Seui," and ROGUSSIA EDDIE ALLEN DANIELSON threatened the employees at the American Savings Bank in Salt Lake with a handgun and a long barreled gun, a dangerous weapon and device.

5. Defendant AJ WILLIANDER drove co-conspirators MARCUS KALANI WATSON, also known as "Kiki Seui," and ROGUSSIA EDDIE ALLEN DANIELSON to the American Savings Bank near Pearlridge, to rob it.

6. Defendant MARCUS KALANI WATSON, also known as "Kiki Seui," and ROGUSSIA EDDIE ALLEN DANIELSON entered the American Savings Bank near Pearlridge to rob it.

7. Defendant MARCUS KALANI WATSON, also known as "Kiki Seui," and ROGUSSIA EDDIE ALLEN DANIELSON threatened the employees at the

American Savings Bank near Pearlridge with two handguns, a dangerous weapon and device.

8. Defendant AJ WILLIANDER parked nearby the American Savings Bank near Pearlridge and drove MARCUS KALANI WATSON, also known as "Kiki Seui," and ROGUSSIA EDDIE ALLEN DANIELSON away from the American Savings Bank near Pearlridge after they had robbed the bank.

All in violation of Title 18, United States Code, Section 371.

COUNT 3 - Bank Robbery
18 U.S.C. § 2113(a) and (d)

The Grand Jury further charges that:

On or about May 1, 2014, the defendant, MARCUS KALANI WATSON, also known as "Kiki Seui," did by force, violence, and by intimidation, take from the person and presence of another, money belonging to, or in the care, custody, control, management, or possession of a bank, to wit, Central Pacific Bank, Wahiawa Branch, located at 935 California Avenue, Wahiawa, Hawaii, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation.

In committing said offense, defendant MARCUS KALANI WATSON, also known as "Kiki Seui," put in jeopardy the life of victim tellers and others by using a

handgun, a dangerous weapon and device, in violation of Title 18, United States Code, Section 2113(a) and (d).

COUNT 4 - Bank Robbery
18 U.S.C. § 2113(a) and (d)

The Grand Jury FURTHER charges that:

On or about May 13, 2014, the defendants, MARCUS KALANI WATSON, also known as "Kiki Seui," and ROGUSSIA EDDIE ALLEN DANIELSON, did by force, violence, and by intimidation, take from the person and presence of another, money belonging to, or in the care, custody, control, management, or possession of a bank, to wit, American Savings Bank, located at 848 Ala Lilikoi Street, Honolulu, Hawaii, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation.

In committing said offense, defendants, MARCUS KALANI WATSON, also known as "Kiki Seui," and ROGUSSIA EDDIE ALLEN DANIELSON, put in jeopardy the life of victim tellers and others by using a handgun and a long barreled gun, both a dangerous weapon and device, in violation of Title 18, United States Code, Section 2113(a) and (d).

COUNT 5 - Bank Robbery
18 U.S.C. § 2113(a) (d) and 2

The Grand Jury further charges that:

On or about May 30, 2014, the defendants, MARCUS KALANI WATSON, also known as “Kiki Seui,” and ROGUSSIA EDDIE ALLEN DANIELSON, and AJ WILLIANDER, did by force, violence, and by intimidation, take from the person and presence of another, money belonging to, or in the care, custody, control, management, or possession of a bank, to wit, American Savings Bank, Pearl City Branch, located at 98-200 Kamehameha Highway, Aiea, Hawaii, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation.

In committing said offense, defendants, MARCUS KALANI WATSON, also known as “Kiki Seui,” and ROGUSSIA EDDIE ALLEN DANIELSON, and AJ WILLIANDER, put in jeopardy the life of victim tellers and others by using two handguns, a dangerous weapon and device, in violation of Title 18, United States Code, Section 2113(a) and (d) and 2.

COUNT 6 – Use of Firearm During Crime of Violence
18 U.S.C. § 924(c) (1)(A)(ii)

The Grand Jury further charges that:

On or about May 30, 2014, in the District of Hawaii, defendant MARCUS KALANI WATSON, also known as “Kiki Seui,” knowingly brandished, used, and

carried a firearm, namely, a handgun, during and in relation to, and possessed that firearm in furtherance of, a crime of violence, namely, bank robbery, in violation of Title 18, United States Code, Section 2113(a) and (d), as charged in Count 5 and, in so doing, brandished that firearm.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT 7 – Use of Firearm During Crime of Violence
18 U.S.C. § 924(c) (1)(A)(ii)

The Grand Jury further charges that:

On or about May 30, 2014, in the District of Hawaii, defendant ROGUSSIA EDDIE ALLEN DANIELSON knowingly brandished, used, and carried a firearm, namely, a handgun, during and in relation to, and possessed that firearm in furtherance of, a crime of violence, namely, bank robbery, in violation of Title 18, United States Code, Section 2113(a) and (d), as charged in Count 5 and, in so doing, brandished that firearm.

//

//

//

//

//

In violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

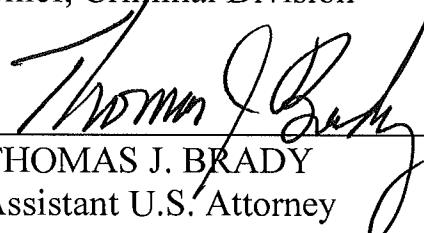
DATED: August 20, 2014, at Honolulu, Hawaii.

A TRUE BILL

/s/ Foreperson, Grand Jury
FOREPERSON, GRAND JURY

FLORENCE T. NAKAKUNI
United States Attorney
District of Hawaii


LESLIE E. OSBORNE, JR.
Chief, Criminal Division


THOMAS J. BRADY
Assistant U.S. Attorney

United States v. Marcus Watson, et al.
Indictment
Cr. No. _____